

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
BOSTON PARENT COALITION FOR)	
ACADEMIC EXCELLENCE CORP.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:25-cv-12015-WGY
)	
BOSTON SCHOOL COMMITTEE and)	
MARY SKIPPER, in her official capacity as)	
Superintendent of the Boston Public Schools,)	
)	
Defendants.)	
_____)	

**DEFENDANTS' ASSENTED-TO MOTION FOR 30-DAY
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants Boston School Committee and Mary Skipper, Superintendent of Boston Public Schools, hereby move for a 30-day extension of time, up to and including September 11, 2025, in which to answer or otherwise respond to the Complaint in this matter. Counsel for Plaintiff Boston Parent Coalition for Academic Excellence Corp. assents to this motion. In support of this motion, Defendants state:

- 1) Given the July 22, 2025 service of the Complaint (*see* ECF No. 11), Defendants' answer or other response to the Complaint is currently due by August 12, 2025.
- 2) However, the extremely busy upcoming work and vacation schedules of undersigned counsel require that they seek additional time in which to assess the Complaint's allegations and research and prepare a response thereto. In this regard, in the coming weeks, the undersigned must prepare and file a First Circuit brief, prepare for and conduct summary

judgment and motion to dismiss hearings in three separate Superior Court cases, and prepare and file a summary judgment reply brief in yet another Superior Court case.

3) The undersigned additionally have long-standing plans to take vacation and other personal time before Labor Day, including attending the American Bar Association annual meeting in Toronto, Canada.

4) Defendants further aver that the Complaint raises complex legal issues regarding constitution-based equal protection. Defendants and its counsel require the additional time sought to properly review and analyze the Complaint's allegations, to determine an appropriate response and to prepare the same.

5) This is Defendants' first request for an extension of time to respond to the Complaint. Defendants respectfully represent that this extension will not prejudice any party and is in the interests of justice and fair play.

6) Counsel for Plaintiff, Christopher M. Kieser, Esq., has been contacted about this motion and assents to it.

WHEREFORE, Defendants respectfully request a 30-day extension of time, up to and including September 11, 2025, in which to answer or otherwise respond to the Complaint.

Respectfully submitted,

BOSTON SCHOOL COMMITTEE and
MARY SKIPPER, Superintendent of Boston Public
Schools,

By their attorneys,

/s/John M. Simon

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Dated: August 5, 2025

Local Rule 7.1(A)(2) Certification

I hereby certify that, pursuant to Local Rule 7.1(A)(2), Defendants' counsel conferred by email with Plaintiff's counsel, Christopher M. Kieser, Esq., on August 4, 2025, regarding the subject matter of this motion in a reasonable and good faith attempt to resolve and/or narrow the issues addressed herein.

/s/ John M. Simon

John M. Simon

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent by first class mail, postage prepaid, to those indicated as nonregistered participants on August 5, 2025.

/s/John M. Simon

John M. Simon